

Message

From: Mathur, Shyam [Mathur.Shyam@epa.gov]
Sent: 1/4/2021 7:26:26 PM
To: Leifer, Kerry [Leifer.Kerry@epa.gov]
Subject: RE: storage stability question re: PFAS

Hi Kerry: FL-PPE are not as common as FL-HDPE, I have not seen many. Thanks.
shyam

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Monday, January 04, 2021 2:21 PM
To: Mathur, Shyam <Mathur.Shyam@epa.gov>
Subject: RE: storage stability question re: PFAS

Thanks Shyam, that is basically what I expected. Do you also see fluorinated polypropylene containers?

Kerry Leifer, Chief
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From: Mathur, Shyam
Sent: Monday, January 04, 2021 1:44 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: RE: storage stability question re: PFAS

Hi Kerry: I have not seen an example like this. The use of Fluorinated - HDPE containers are very common in ss & cc studies and I have seen number of examples. I do not know the process how the FL-HDPE containers are made. The ss & cc studies do not mention how the applicant is procuring the FL-HDPE containers?
shyam

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Monday, January 04, 2021 1:32 PM
To: Mathur, Shyam <Mathur.Shyam@epa.gov>
Subject: FW: storage stability question re: PFAS

Hi Shyam,

See Mike Goodis' email below—have you seen any examples of this in any SS/CC studies you may have looked at?

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From: Leifer, Kerry
Sent: Monday, January 04, 2021 1:30 PM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: RE: storage stability question re: PFAS

Thanks Mike, that is helpful in understanding the issue.

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From: Goodis, Michael
Sent: Monday, January 04, 2021 1:24 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: RE: storage stability question re: PFAS

The issue that seems to be developing is that HDPE– High Density Poly Ethylene containers are being treated to fluorine gas that coats and strengthens them.
This process is creating a situation where PFAS can be leached into the pesticide product stored in the treated container depending on the ingredients in the product.
Any information that may be in the submitted data that can help point us to similar conditions would be helpful because this may end up being a broader issue about the containers.

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From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Monday, January 04, 2021 12:08 PM
To: Aubee, Catherine <Aubee.Catherine@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: storage stability question re: PFAS

In answer to the first question, other than the reviews themselves we don't extract any information from the storage stability/corrosion characteristics studies. Regarding any PFAS-type coating, I am not aware that we have seen such (typically such coatings are used on paper and pesticide containers typically are not of this type)—I will check to see if I can get more information on that.

In answer to the second question, yes the SS/CC studies are in Documentum.

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From: Aubee, Catherine
Sent: Monday, January 04, 2021 11:59 AM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: storage stability question re: PFAS

Thanks! I'm aware that many of these SS/CC data have been submitted but not reviewed. For those that have, is it accurate to say that we do not typically extract this type of information? Are the studies generally available in Documentum?

Best,
Catherine

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Monday, January 04, 2021 11:48 AM
To: Fitz, Nancy <Fitz.Nancy@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: storage stability question re: PFAS

The storage stability/corrosion characteristics data requirements includes the identification of the container type, including any coating or liner.

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